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6 WINGSAIL HOLDINGS, LLC and
6 YUNFEI "KRISTY" BAI

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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

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11 WINGSAIL HOLDINGS, LLC, a Washington Corporation, and YUNFEI "KRISTY" BAI, an individual,) Case No.: 8:23-CV-02398-JWH-DFM
12 Plaintiffs,) PLAINTIFFS' EX PARTE
13 vs.) APPLICATION TO CONTINUE
14) TRIAL AND RELATED DATES AND
15 ANDREW POLSKY, an individual, and) DEADLINES
16 SEFED, a California Corporation, and)
16 DOES 1 through 10,)
17 Defendants.)
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19 TO THIS HONORABLE COURT AND TO DEFENDANTS AND THEIR
20 COUNSEL OF RECORD:

21 Plaintiff WINGSAIL HOLDINGS, LLC and YUNFEI "KRISTY" BAI
22 hereby submit this ex parte application to continue the presently-scheduled trial
23 date of December 1, 2025, to mid-March of 2026, and to extend all related dates
24 and deadlines pursuant to Federal Rules of Civil Procedure, Rule 16(b)(4) and
25 United States District Court, Central District of California, Local Rule 7-19.
26 Plaintiffs believe good cause exists for this requested trial continuance and
27 extension of related dates and deadlines for the following reasons:

28 • Defendants have moved to dismiss Plaintiffs' Second Amended

1 Complaint, and the Court took that motion under submission on
2 February 25, 2025. The Court has not yet issued a decision on that
3 motion and, therefore, Defendants have not filed an answer to the
4 Second Amended Complaint and as a result Plaintiffs have not been
5 given a reasonable opportunity to conduct discovery as to any denials,
6 affirmative defenses, and/or any other new matter that may be raised
7 in the answer. The present discovery deadline of July 25, 2025, in fact
8 gives them no opportunity to conduct such discovery.

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- 10 Plaintiffs have recently changed attorneys, with new counsel
11 substituting in as counsel of record on May 21, 2025. New counsel is
12 of the opinion that some additional discovery needs to be conducted in
13 the form of document requests to Defendants and two to three
14 depositions of percipient witnesses, and the currently-scheduled
15 deadline of July 25, 2025 will not afford a reasonable opportunity to
16 complete that discovery.
- 17
- 18 New counsel for Plaintiffs currently already has trial scheduled the
19 first half of December in a case pending in Los Angeles County
20 Superior Court that is up against the five-year deadline to bring the
case to trial, so the likelihood that trial will commence at that time is
great.

21 For those reasons, Plaintiffs respectfully request a three and one-half month
22 continuance of the trial date and extension of related trial dates and deadlines.

23 Counsel for Plaintiffs and counsel for Defendants met and conferred about
24 the request Plaintiffs are making herein, but were unable to reach an agreement.

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1 (See Buus Declaration, ¶ 7, Exhibit “A.”) As such, Plaintiffs expect Defendants to
2 oppose this ex parte application.

3 Respectfully submitted,

4 Dated: July 14, 2025 BUUS LAW GROUP APC

5 /s/ William L. Buus

6 By: William L. Buus
7 Counsel for Plaintiffs
8 WINGSAIL HOLDINGS, LLC and
YUNFEI “KRISTY” BAI

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1 **PROOF OF SERVICE**

2 I am employed in the County of Orange, State of California. I am over the
3 age of eighteen (18) years and am not a party to the within action. My business
4 address is that of 3 Pointe Drive, Suite 110, Brea, California 92821.

5 I hereby certify that on July 14, 2025, I electronically filed the foregoing
6 PLAINTIFFS' EX PARTE APPLICATION TO CONTINUE TRIAL AND
7 RELATED DATES AND DEADLINES with the Clerk of the Court using ECF
8 which will send notification and a copy of such filing to the following persons:

9 Alejandro S. Angulo, Esq.
10 *aangulo@rutan.com*
11 Joelle Leib, Esq.
12 *jleib@rutan.com*
13 RUTAN & TUCKER, LLP
14 18575 Jamboree Road, 9th Floor
15 Irvine, California 92612
16 Tel.: 714-641-5100
17 Fax: 714-546-9035

18 Attorneys for Defendants ANDREW POLSKY and SEFED

19 Executed on July 14, 2025, at Brea, California. I declare under penalty of
20 perjury under the laws of the United States of America that the foregoing is true
21 and correct.

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/s/ William L. Buus